

[Parties and Counsel Listed on Signature Pages]

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

*People of the State of California, et al. v. Meta
Platforms, Inc., et al.*

MDL No. 3047

Case Nos. 4:22-md-03047-YGR-PHK

4:23-cv-05448-YGR

**META AND STATE AGS’
STIPULATION AND [PROPOSED]
ORDER EXTENDING DEADLINES TO
SUBSTANTIALLY COMPLETE STATE
AGENCY DOCUMENT PRODUCTIONS
AND DEPOSITIONS**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to Civil Local Rules 6-2 and 7-12, the State Attorneys General (“State AGs”) and Defendants Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; and Meta Platforms Technologies, LLC (collectively, “Meta,” and together, the “Parties”), through their undersigned counsel, hereby stipulate as follows:

1. Under the schedule ordered by Magistrate Judge Kang on December 31, 2024 (ECF 1495), the deadlines for State AGs and state agencies to complete substantial production of documents range from mid-January to early February 2025 (extended to late February 2025 for one State, Kentucky). *See* ECF 1495, 1495-1.

2. The State AGs have represented to Meta that all but one of the State AGs have met their substantial completion deadlines with respect to documents produced from their respective State AG offices. Discussions about the State AGs’ responses to two remaining RFPs in Meta’s Third Set of RFPs are still ongoing, and any productions made pursuant to those discussions will be completed by the end of the current fact discovery period, April 4, 2025.

3. As of February 10, 2025, at least one agency in the following States had not met its substantial completion deadline, as ordered by Magistrate Judge Kang on December 31, 2024 (ECF 1495): Arizona, California, Colorado, Hawaii, Illinois, Kansas, Louisiana, Nebraska, New Jersey, New York, Pennsylvania, South Carolina, Wisconsin, and Virginia. *See* ECF 1669 at 2 n.2; 1675 at 2 n.2. Other States have already sought extensions of that deadline from the Court.

4. Meta is currently required to complete depositions of all State witnesses¹ by April 4, 2025, with many States having presumptive deposition windows that close even earlier. *See* ECF 1495, 1495-1.

5. In light of many States not having substantially completed productions from some agencies, or anticipating not substantially completing productions by their current deadlines, and given the resulting short time period for Meta to review and effectively take depositions of State witnesses, the

¹ References to “depositions of State witnesses” throughout this stipulation and proposed order mean Rule 30(b)(6) and fact depositions of State AGs and state agencies, and their current and former employees, pursuant to deposition notices and/or subpoenas.

1 Parties agree, subject to Court approval, to extend the deadlines (1) for the States to substantially (and
2 then fully) complete document productions and, in turn, (2) for Meta to take depositions of State witnesses.

3 6. The Parties agree to continue working cooperatively and diligently to advance agency
4 document productions, including the State AGs' and state agencies' agreement to collect, review, and
5 produce relevant, non-privileged documents returned by agreed-upon search terms and other parameters
6 on a rolling basis; and Meta's agreement to provide updated search terms to facilitate the meeting of
7 agreed-upon document review caps (where applicable).

8 7. Absent good cause, Meta and the State AGs agree to finalize, and, if necessary, brief, all
9 disputes about the scope of the State AGs' and state agencies' responses and objections to Meta's existing
10 RFPs by March 14. For avoidance of doubt, disputes regarding assertions of privilege, redactions,
11 confidentiality designations, and the sufficiency of the State AGs' and state agencies' productions are not
12 encompassed by this paragraph. The extension of the deadline for Meta to complete fact and Rule 30(b)(6)
13 depositions of State witnesses does not and will not affect any other deadlines already set or that may be
14 set regarding disputes over written discovery.

15 8. The Parties further agree that the overall hours limit for depositions of State witnesses is
16 629 hours on the record, with a 30-hour cap per State asserting consumer protection claims, and a 12-hour
17 cap per State asserting only COPPA claims.

18 9. This Court has previously extended the deadlines for state agencies to substantially
19 complete document productions three times, including initially on agreement of all Parties to the MDL as
20 part of an MDL-wide schedule extension. *See* ECF 1159, 1380, 1495. The Court granted a further
21 extension of Kentucky's substantial completion deadline. *See* ECF 1631. New Jersey and certain
22 California agencies have requested, but have not yet received, further extensions. *See* ECF Nos. 1655,
23 1663.

24 10. The Court has not extended Meta's deadline to complete depositions.²

25
26 ² The Court extended the presumptive window for Meta to take depositions of Kentucky witnesses in
27 conjunction to granting Kentucky's request to extend its substantial completion deadline, ECF 1631, but
28 (continued...)

11. The changes in these deadlines will not automatically affect other deadlines in the case schedule, but they may or may not require future requests by the Parties and future action by the District Court on other deadlines in the case schedule. The Parties reserve all rights with respect to other changes to deadlines.

12. Therefore, the Parties agree, subject to the Court's approval, that the following deadlines will apply:

- a. Deadline to substantially complete production of all State AG and agency documents: **March 14, 2025**
- b. Parties' deadline to finalize, and, if necessary, brief, all disputes about the scope of the State AGs' and state agencies' responses and objections to Meta's existing RFPs: **March 14, 2025**
- c. Deadline to complete production of all State AG and agency documents: **April 4, 2025**
- d. First date on which Rule 30(b)(6) depositions of State witnesses may be taken: **April 7, 2025**
- e. Deadline for Parties to meet and confer to identify and commence scheduling individual State fact witness depositions (*and* to meet and confer regarding any such disputes): **May 9, 2025**
- f. Deadline for Meta to serve deposition notices for individual State fact witness depositions: **May 30, 2025**
- g. Meta's deadline to complete fact and Rule 30(b)(6) depositions of State witnesses: **July 18, 2025**
- h. Overall hours limit for depositions of State witnesses: **629 hours** on the record, with a **30-hour cap** per State asserting consumer protection claims, and a **12-hour cap** per State asserting only COPPA claims.

did not extend Meta's *deadline* to complete depositions of Kentucky's 30(b)(6) and fact witnesses, which was always April 4, 2025, ECF 1495-1 at 11.

1 **IT IS SO STIPULATED AND AGREED.**

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3 Respectfully submitted,

4 DATED: February 13, 2025

By: /s/ Megan O'Neill

5 **ROB BONTA**

6 Attorney General
7 State of California

8 Nicklas A. Akers (CA SBN 211222)
9 Senior Assistant Attorney General
10 Bernard Eskandari (SBN 244395)
11 Emily Kalanithi (SBN 256972)
12 Supervising Deputy Attorneys General
13 Nayha Arora (CA SBN 350467)
14 Megan O'Neill (CA SBN 343535)
15 Joshua Olszewski-Jubelirer (CA SBN 336428)
16 Marissa Roy (CA SBN 318773)
17 Brendan Ruddy (CA SBN 297896)
18 Deputy Attorneys General
19 California Department of Justice
20 Office of the Attorney General
21 455 Golden Gate Ave., Suite 11000
22 San Francisco, CA 94102-7004
23 Phone: (415) 510-4400
24 Fax: (415) 703-5480
25 Megan.Oneill@doj.ca.gov

26 *Attorneys for Plaintiff the People of the State of*
27 *California*

28 **PHILIP J. WEISER**

Attorney General
State of Colorado

/s/ Krista Batchelder

Krista Batchelder, CO Reg. No. 45066,
pro hac vice
Deputy Solicitor General
Shannon Stevenson, CO Reg. No. 35542, *pro hac vice*
Solicitor General
Elizabeth Orem, CO Reg. No. 58309, *pro hac vice*
Assistant Attorney General
Colorado Department of Law

Ralph L. Carr Judicial Center
Consumer Protection Section
1300 Broadway, 7th Floor
Denver, CO 80203
Phone: (720) 508-6651
krista.batchelder@coag.gov
Shannon.stevenson@coag.gov
Elizabeth.orem@coag.gov

*Attorneys for Plaintiff State of Colorado, ex rel.
Philip J. Weiser, Attorney General*

RUSSELL COLEMAN
Attorney General
Commonwealth of Kentucky

/s/ Philip Heleringer
J. Christian Lewis (KY Bar No. 87109),
Pro hac vice
Philip Heleringer (KY Bar No. 96748),
Pro hac vice
Zachary Richards (KY Bar No. 99209),
Pro hac vice
Daniel I. Keiser (KY Bar No. 100264),
Pro hac vice
Matthew Cocanougher (KY Bar No. 94292),
Pro hac vice
Assistant Attorneys General
1024 Capital Center Drive, Suite 200
Frankfort, KY 40601
CHRISTIAN.LEWIS@KY.GOV
PHILIP.HELERINGER@KY.GOV
ZACH.RICHARDS@KY.GOV
DANIEL.KEISER@KY.GOV
MATTHEW.COCANOUGH@KY.GOV
Phone: (502) 696-5300
Fax: (502) 564-2698

Attorneys for Plaintiff the Commonwealth of Kentucky

MATTHEW J. PLATKIN
Attorney General
State of New Jersey

/s/ Thomas Huynh
Kashif T. Chand (NJ Bar No. 016752008),
Pro hac vice

1 Section Chief, Deputy Attorney General
2 Thomas Huynh (NJ Bar No. 200942017),
3 *Pro hac vice*
4 Assistant Section Chief, Deputy Attorney General
5 Verna J. Pradaxay (NJ Bar No. 335822021),
6 *Pro hac vice*
7 Mandy K. Wang (NJ Bar No. 373452021),
8 *Pro hac vice*
9 Deputy Attorneys General
10 New Jersey Office of the Attorney General,
11 Division of Law
12 124 Halsey Street, 5th Floor
13 Newark, NJ 07101
14 Tel: (973) 648-2052
15 Kashif.Chand@law.njoag.gov
16 Thomas.Huynh@law.njoag.gov
17 Verna.Pradaxay@law.njoag.gov
18 Mandy.Wang@law.njoag.gov

19 *Attorneys for Plaintiffs New Jersey Attorney General*
20 *and the New Jersey Division of Consumer Affairs*
21 *Matthew J. Platkin, Attorney General for the State of*
22 *New Jersey, and Cari Fais, Acting Director of the New*
23 *Jersey Division of Consumer Affairs*

24 By: /s/ Ashley M. Simonsen

25 **COVINGTON & BURLING LLP**

26 Ashley M. Simonsen, SBN 275203
27 COVINGTON & BURLING LLP
28 1999 Avenue of the Stars
Los Angeles, CA 90067
Telephone: (424) 332-4800
Facsimile: + 1 (424) 332-4749
Email: asimonsen@cov.com

Phyllis A. Jones, *pro hac vice*
Paul W. Schmidt, *pro hac vice*
COVINGTON & BURLING LLP
One City Center
850 Tenth Street, NW
Washington, DC 20001-4956
Telephone: + 1 (202) 662-6000
Facsimile: + 1 (202) 662-6291
Email: pajones@cov.com

*Attorney for Defendants Meta Platforms, Inc.;
Instagram, LLC; Meta Payments, Inc.; and Meta
Platforms Technologies, LLC*

SIGNATURE CERTIFICATION

Under Civ. L.R. 5-1(h)(3), I, Megan O'Neill, hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in this filing's content and have authorized this filing.

DATED: February 13, 2025

/s/ Megan O'Neill

Megan O'Neill

Attorney for Plaintiff the People of the State of California

Co-Lead Counsel for State Attorneys General

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**
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4 DATED:

5 PETER H. KANG
6 UNITED STATES MAGISTRATE JUDGE
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